

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

O.R., by and through his parents,
 Cheryl Rogers and Greg Rogers, on behalf
 of himself and those similarly situated;
 Cheryl Rogers; Greg Rogers; E.G., by and
 through her mother, Amber Galea, on
 behalf of herself and those similarly
 situated; M.G by and through her mother,
 Amber Galea; and W.M., by and through
 his mother, Kersey Clark,

Plaintiffs,

v.

Greenville County, South Carolina;
 Greenville County Library System;
 Beverly James, in her official capacity as
 Executive Director of the Greenville
 County Library System; and Karen Allen,
 in her official capacity as Youth Services
 Manager of the Greenville County Library
 System,

Defendants.

Civil Action No. 6:25-2599-DCC

DEFENDANT GREENVILLE COUNTY'S
RESPONSES TO LOCAL RULE 26.01
INTERROGATORIES

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, the Defendant Greenville County submits the following answers to interrogatories as required by the Court:

A. State the full name, address and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE A:

None.

B. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE B:

Non-jury as this action seeks declaratory and injunctive relief.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE C:

Not applicable to the Defendant Greenville County.

D. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE D:

The Greenville Division is appropriate.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical

parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE E:

The Defendant Greenville County is not aware of any related actions filed within the United States District Court - District of South Carolina.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE F:

The Defendant Greenville County is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE G:

Not applicable.

H. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

RESPONSE H:

Not applicable.

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